

EXHIBIT 2

Notice to Lower Court

**STATE OF MICHIGAN
IN THE WASHTENAW COUNTY CIRCUIT COURT**

ELI SAVIT, PROSECUTING ATTORNEY
FOR WASHTENAW COUNTY ex rel., the
People of the State of Michigan, and CITY OF
YPSILANTI,

Plaintiffs,

v.

VALLEYTREE PARTNERS LLC, VTP A1 LP,
VTP ARBOR GP LLC, VTP ARBOR JV LP, VTP
ARBOR ONE LLC, VTP RIVER WOODS, LLC,
SAMUEL ROSENTHOL, YAAKOV NUSBAUM
and AMY VUJNOV,

Defendants,

Case No. 25-000262-CH

Hon. Carol Kuhnke

**DEFENDANTS' NOTICE OF FILING
NOTICE OF REMOVAL TO FEDERAL
COURT**

**DEFENDANTS' NOTICE OF FILING NOTICE
OF REMOVAL TO FEDERAL COURT**

PLEASE TAKE NOTICE THAT, under 28 U.S.C. §§ 1331, 1441 and 1446, defendants Valleytree Partners LLC, VTP A1 LP, VTP Arbor GP LLC, VTP Arbor JV LP, VTP Arbor One LLC, VTP River Woods, LLC, Samuel Rosenthal, Yaakov Nusbaum and Amy Vujnov have filed with the Clerk of the United States District Court for the Eastern District of Michigan, Southern Division a Notice of Removal effecting removal of this action to the District Court. A copy of the Notice of Removal (without exhibits) is attached as **Exhibit A**.

Respectfully submitted,

BODMAN PLC

By: /s/ J. Adam Behrendt
J. Adam Behrendt (P58607)
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Attorneys for Defendants

Dated: March 20, 2025

PROOF OF SERVICE

I hereby certify that on March 20, 2025, I electronically filed the foregoing papers with the Clerk of the Court using the E-filing system which will send notification of such filing to all attorneys of record.

/s/ J. Adam Behrendt (P58607)